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HMO Colorado Inc. d/b/a HMO Nevada*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC

Plaintiff,

vs.

ROCKY MOUNTAIN HOSPITAL AND
MEDICAL SERVICE, INC. d/b/a ANTHEM
BLUE CROSS AND BLUE SHIELD; HMO
COLORADO INC. d/b/a HMO NEVADA

Defendants.

Case No.: 2:18-cv-00761-RFB-GWF

**STIPULATION AND ORDER TO EXTEND
DISCOVERY STAY**

(First Request)

Plaintiff Sunrise Hospital and Medical Center, LLC (“Plaintiff”) and Defendants Rocky Mountain Hospital and Medical Service, Inc. d/b/a Anthem Blue Cross and Blue Shield and HMO Colorado Inc. d/b/a HMO Nevada (“Defendants”, and collectively with Plaintiff, the “Parties”) submit the following Stipulation and Order to Extend Discovery Stay:

1 1. On March 14, 2019, the Parties submitted a Status Report and Stipulation to Stay
2 Discovery (the “Stipulation”) in which they reported the Parties’ agreement to pursue private
3 mediation and requested to stay discovery for fourteen (14) days to allow for the selection of a
4 mediator and mediation date. (Dkt. 45.) The Parties also stipulated to provide the Court with a status
5 report concerning the scheduling of the mediation and the Parties’ agreement as to an extension of the
6 stay of discovery pending mediation on or before March 29, 2019. (Dkt. 45.) The Court entered the
7 Stipulation and Order on March 15, 2019. (Dkt. 46.)

8 2. The Parties have exchanged proposed mediators and their efforts to select a mediator
9 and mediation date are ongoing. The Parties thus require additional time to complete the scheduling
10 of the mediation and, as such, agree and stipulate to extend the stay of discovery for an additional
11 fourteen (14) days up through and including April 12, 2019.

12 3. The Parties further agree and stipulate that, on or before April 12, 2019, the Parties will
13 provide the Court with a status report concerning the scheduling of the mediation and inform the Court
14 of the Parties’ agreement as to an extension of the stay of discovery pending mediation.

15 4. This is the Parties’ first request to extend the stay of discovery.
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5. There is good cause to extend the stay. An extension of the stay will allow the Parties to focus their continuing efforts on early resolution in an efficient manner and save the Parties' time and expense of discovery. Moreover, as no trial in this matter has been set, the requested extension of the stay does not require a change to any trial date. The Parties jointly request to extend the stay. Neither Party to this lawsuit will be prejudiced by the extension of the stay.

IT IS SO AGREED AND STIPULATED:

Dated this 29th day of March, 2019

Lapidus & Lapidus, PLC

By: /s/ Daniel C. Lapidus

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Dated this 29th day of March, 2019

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 1, 2019

CASE NO.: 2:18-cv-00761-RFB-GWF